

Kleinberg, Kaplan, Wolff & Cohen, P.C.

Attorneys at Law  
551 Fifth Avenue  
New York, New York 10176  
212.986.6000  
Fax: 212.986.8866  
www.kkwc.com

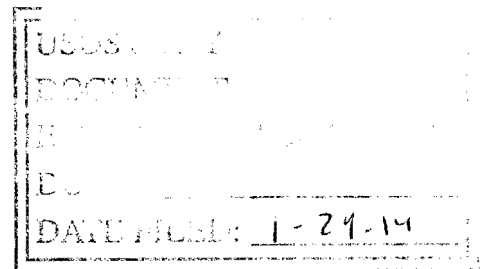
Direct Dial: 212.880.9897  
E-Mail: [MRosen@KKWC.com](mailto:MRosen@KKWC.com)

MEMO ENDORSED

January 29, 2014

Via Email

Hon. Richard J. Sullivan  
United States District Judge  
Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square  
New York, New York 10007



**Re: *Professional Merchant Advance Capital, LLC aka Promac Financing  
v. C Care Services LLC, C Care Medical Center, LLC, C Care Medical  
Supply, LLC, and Cecilia DeLeon Sobier – Index No. 13-CV-6562***

Dear Judge Sullivan:

Counsel for plaintiff and defendants respectfully submit this joint status letter in order to request additional time in which to pursue settlement efforts. Your Honor's Order, entered on December 6, 2013, provided time for the parties to engage in settlement efforts and directed that, on January 30, 2014, plaintiff's counsel serve a copy of its second amended complaint (if any) and defendants' attorneys set forth their proposed briefing schedule for a motion to dismiss (if any). In the time since our last court conference on December 6, 2013, the parties have been working towards possible settlement. Specifically, on December 24, 2013, for settlement purposes plaintiff's counsel circulated a list of specific document requests, and since then defendants have been gathering documents and conferring with counsel and financial consultants in an effort to present plaintiff with adequate information, in an organized way, in order to facilitate the prospect of settlement. Additionally, defendants anticipate that an audit that may be relevant to these settlement discussions will be completed late next week.

All of the parties believe that an additional extension of one month would greatly assist the parties in working towards an amicable settlement. This application represents the parties' first request for an extension of time with respect to the deadlines set forth in the December 6, 2013 Order. Counsel for all parties respectfully request the deadlines contained in the Order dated December 6, 2013 be extended to February 28, 2014, and request the opportunity

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Hon. Richard J. Sullivan  
January 29, 2014  
Page 2

on February 28, 2014 to submit a further joint status letter to the Court, which would set forth whether plaintiff is amending its pleadings and whether defendants intend to move for dismissal and, if so, on what schedule the parties propose the motion be briefed, along with an updated pre-trial order.

Respectfully yours,



Marc R. Rosen

MRR:sg

cc: Rudyard W. Ceres

SO ORDERED  
Dated:

  
RICHARD J. SULLIVAN  
U.S.D.J.

1/29/14